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14 || Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

18 | Socheat Chy,

Plaintiff,

20 | P a g e

Case No. 2:17-cv-04325

21 Sing Lim; Ray Lim; Tiffany Ngo;
22 Ngo Asset Management, LLC;
23 Tiffany Ngo in her capacity as
24 trustee of the Tiffany Ngo Living
25 Trust UTD; Naing Lam Yam; Jane
26 Doe 1; Cindy Kanya Chan; Molica
Ratha Keo; Nivodeth Khliev;
Defendant Doe Gas Station 2;
Defendant Doe Gas Station 3;
Defendant Doe Laundromat 4; and
DOES 5 through 10, inclusive.

Defendants.

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT BY 30 DAYS AS TO
DEFENDANTS MOLICA RATHA
KEO AND NIVODETH KHIEV**

Complaint served: June 18, 2017
Current response date: July 10, 2017
New response date: August 9, 2017

1 Plaintiff Socheat Chy (“Socheat” or “Plaintiff”) by and through her
2 counsel, and Defendants Nivodeth Khiev and Molica Ratha Keo, in propria
3 persona, hereby stipulate pursuant to Local Rule 8-3 to extend the time for
4 Defendants to answer or otherwise respond to Plaintiff’s Complaint to and
5 including August 9, 2017.

6 WHEREAS, Plaintiff filed her Complaint on June 9, 2017 in the United
7 States District Court, Central District of California.

8 WHEREAS, Plaintiff served Defendants with the Complaint on June 18,
9 2017.

10 WHEREAS, Defendants’ responsive pleading or motion to dismiss the
11 Complaint is currently due on July 10, 2017.

12 WHEREAS, the parties agree and stipulate that Defendants’ time to
13 answer or otherwise respond to the complaint shall be extended to August 9,
14 2017.

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17 Dated: June 30, 2017

WILMER CUTLER PICKERING HALE AND
DORR LLP

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By: /s/ Lorraine B. Echavarria
Lorraine B. Echavarria (SBN: 191860)

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Attorney for Plaintiff

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Dated: 7/3, 2017

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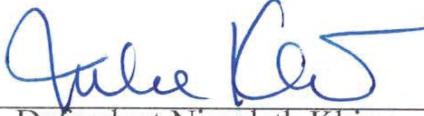
By: Molica Keo
Defendant Molica Ratha Keo

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1 Dated: 7/3, 2017

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3 By: 
4 Defendant Nivodeth Khiev

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Wilmer Cutler Pickering Hale and Dorr LLP, 350 South Grand Avenue, Suite 2100, Los Angeles, California 90071.

On July 6, 2017, I served the foregoing document(s) described as:

**JOINT STIPULATION TO EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT BY 30 DAYS AS TO DEFENDANTS MOLICA
RATHA KEO AND NIVODETH KHIEV**

on each interested party through their attorney of record, or at their last known address, as stated below.

(BY U.S. MAIL) I caused such document(s) to be deposited with the U.S. Postal Service by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California, addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

Heidi S. Lewis
SULLIVAN, KRIEGER, TRUONG,
SPAGNOLA & KLAUSNER, LLP
2 Park Plaza, Suite 900
Irvine, CA 92614

Attorney for Defendants Lam Sin Yam, Ray Lim, and Tiffany Ngo, individually and as a trustee of the Tiffany Ngo Living Trust UTD, and Ngo Asset Management, LLC

PROOF OF SERVICE
(Continued)

Molica Ratha Keo
Long Beach, CA

Nivodeth Khiel
Long Beach, CA

Naing Lam Yam
Long Beach, CA

Cindy Kanya Chan
Long Beach, CA

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 6, 2017 at Los Angeles, California.

Gina Gaytan